

LEVY RATNER P.C.
Aleksandr L. Felstiner, Bar No. 281906
Levy Ratner, P.C.,
80 8th Ave., 8th Fl.
New York, NY 10011
212-627-8100
afelstiner@levyratner.com
Attorneys for Plaintiffs

JONES DAY
Aaron L. Agenbroad, Bar No. 242613
555 California St., 26th Fl.
San Francisco, CA 94104
415-626-3939
alagenbroad@jonesday.com

Liat Yamini, Bar No. 251238
555 S Flower St., 50th Fl.
Los Angeles, CA 90071
213-489-3939
lyamini@jonesday.com

Wendy C. Butler (*pro hac vice*)
Christian A. Bashi (*pro hac vice*)
250 Vesey St.
New York, NY 10080
212-326-3723
wbutler@jonesday.com
cbashi@jonesday.com
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

-----X
CHEYNE ANDERSON, JESUS CASTELLANO,
HANNAH MIRZA, KATHLEEN O'BEIRNE,
SETH TAYLOR, WILLIAM VAN DER LAAR,
MARK WESLEY DUDLEY, RACHEL WESTRICK,
JIAJUN XU, individually and on behalf of all others
Similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

-----X

Case No. 5:25-cv-03268-BLF

**JOINT STIPULATION AND
[PROPOSED] ORDER GRANTING
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

Date: January 22, 2026

Time: 9:00 AM

Dept.: Courtroom 1

Judge: Hon. Beth Labson Freeman

Pursuant to Local Rule 7-12, Plaintiffs Cheyne Anderson, Jesus Castellano, Hannah Mirza, Kathleen O’Beirne, Seth Taylor, William Van Der Laar, Mark Westley Dudley, Rachel Westrick, and Jiajun Xu (“Plaintiffs”), and Defendant Google LLC (“Defendant”) (collectively, the “Parties”) stipulate and respectfully request that the Court enter an order granting Plaintiffs leave to file a Second Amended Complaint, in the form attached to this Stipulation, and vacating the oral argument scheduled for January 22, 2026, in consideration of the following facts:

WHEREAS, on September 23, 2025, the Court approved the Parties’ Joint Stipulation Continuing the Briefing Schedule on Plaintiffs’ Motion for Leave to File an Amended Complaint (ECF No. 40), setting a deadline of September 24, 2025 for Plaintiffs to furnish “further proposed amendments to the operative complaint,” and a deadline of October 3, 2025 for Defendant to “inform Plaintiffs as to whether it will stipulate to or oppose Plaintiff’s proposed amendments;” and

WHEREAS, Plaintiffs provided Defendant a copy of the revised proposed Second Amended Complaint on September 24, 2025; and

WHEREAS, Defendant sent Plaintiffs’ counsel an email on September 29, 2025 stipulating Defendant’s consent to Plaintiffs filing the revised proposed Second Amended Complaint;

NOW THEREFORE, in the interest of efficiency and preserving judicial resources, the Parties hereby jointly stipulate, agree, and respectfully request an Order as follows:

1. That Plaintiffs be granted leave to file the [Proposed] Second Amended Complaint approved by Defendant on September 29, 2025 and attached to this Stipulation;
2. That the Clerk be ordered to file the [Proposed] Second Amended Complaint attached to this Stipulation.

3. That the deadline for Defendant to file a responsive pleading to the Second Amended Complaint be set for thirty (30) days after the Second Amended Complaint is deemed filed, as set forth in the Court's September 23, 2025 Order;

4. That the oral argument scheduled for January 22, 2026 on Plaintiffs' Motion for Leave to Amend be vacated; and

5. That Defendant's October 2, 2025 deadline to answer or otherwise respond to the First Amended Complaint (ECF No. 8) be vacated.

The Parties agree that this Stipulation will not affect any other scheduled dates, including the case-management dates set by the Court's September 23, 2025 Order.

A Proposed Order is being filed in connection with this Stipulation.

Dated: October 2, 2025

Respectfully Submitted,

LEVY RATNER, P.C.

JONES DAY

By: /s/Aleksandr L. Fesltiner

By: /s/Aaron L. Agenbroad

Aleksandr L. Felstiner

Aaron L. Agenbroad

Attorneys for Plaintiffs

Attorneys for Defendant

ATTESTATION

I, Aleksandr Felstiner, am the ECF User whose ID and password are being used to file this document. In Compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel of record for all Parties have concurred in this filing.

By: /s/Aleksandr L. Felstiner

Aleksandr L. Felstiner